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DEMETRIC DI-AZ and OWEN DIAZ

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFF'S DESIGNATION OF  
REBUTTAL TESTIMONY OF  
DEMETRIC DI-AZ RELATING TO  
DEFENDANT'S EXHIBIT 379**

Trial Date: September 24, 2021

Complaint filed: October 16, 2017

Plaintiff hereby submits the following deposition testimony of Demetric Di-az in rebuttal to Defendant's Exhibits No. 379.

**Di-Az, Demetric 5/15/18, Volume 1**

#	Lines	Deposition Excerpt
1	43:17-44:01	43:17 Q. Let me rephrase it. Did you submit this as part 18 of your application to work at West Valley in October of 19 2015? 20 A. No. 21 Q. Did you submit this as part of your application 22 to work at Tesla in October of 2015? 23 A. No. 24 Q. Did you ever submit this resume to either Tesla 25 or West Valley? 44:01 A. No.
2	44:06-44:11	44:6 Q. Let me represent to you for the record that this 7 document was actually produced by Tesla. Could you be 8 mistaken in that you may have submitted this resume to 9 Tesla in October of 2015? 10 A. I could be mistaken, but I don't ever remember 11 sending out this resume.
3	44:15-44:16	44:15 Q. And is that your current phone number? 16 A. No.
4	46:19-46:25	46:19 Q. Exhibit 8 is a screenshot from Tesla's applicant 20 system, which is Bates-stamped at the bottom 157 through 21 162. I just want to turn your attention to the page 22 that's Bates-stamped at the bottom 158. 23 Do you see that? Do you see your e-mail at the 24 top of this page? 25 A. Yes.
5	47:04-47:06	47:4 Q. Did you ever hold an e-mail address that was 5 demetric D-I-O-A-Z @gmail.com? 6 A. No.
6	50:05-50:13	50:5 Q. Do you remember having an interview with Tai Hua 6 at Tesla? 7 A. No. 8 Q. Do you ever remember speaking to Tai Hua as 9 Tesla? 10 A. No. 11 Q. Do you remember ever having an interview with 12 anybody at Tesla for a job? 13 A. No.

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